



SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

**BELL LUMBER & POLE COMPANY
PLANT OPERATIONS
NEW BRIGHTON, MINNESOTA**

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**Prepared by:
Conestoga-Rovers
& Associates**

1801 Old Highway 8
Suite 114
St. Paul, Minnesota 55112

Office: (651) 639-0913
Fax: (651) 639-0923

web: <http://www.CRAworld.com>

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REVISION LOG

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**SPILL PREVENTION, CONTROL
AND COUNTERMEASURE (SPCC) PLAN
AND RESPONSE PLAN
BELL LUMBER & POLE COMPANY**

DISTRIBUTION LIST

- Plant Managers Office
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- Plant Personnel Lunch Room
- Plant Maintenance Office
- Safety and Quality Control Office

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1.0 INTRODUCTION

I hereby certify that the information provided in this Spill Prevention Control and Countermeasure (SPCC) Plan is, to the best of my knowledge, true, and accurate. Management approval has been extended at a level with authority to commit the necessary resources to implement this SPCC Plan. Pursuant to §112.7(d)(2) this is the written commitment of Bell Lumber & Pole Company to provide the manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful to human health and the environment. This plan will be implemented as herein described and the Plan will be physically maintained at the Bell Lumber & Pole Company Facility, New Brighton, Minnesota (Bell Pole).

Richard M. Bleske

Signature, Authorized Facility Representative

6-22-09

Date

Richard M Bleske

Name (Printed)

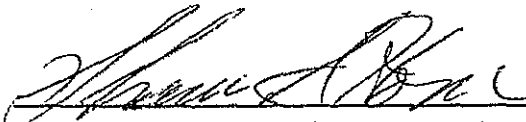
Midwest Operations Coordinator

Title

2.0 ENGINEERING CERTIFICATION

Pursuant to §112.3(d)(1) and by means of this SPCC certification I attest that: (i) I am familiar with the requirements of the SPCC rule (40 CFR Part 112); (ii) I or a person under my direct supervision has visited and examined the facility; (iii) the Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule; (iv) procedures for required inspections and testing have been established, and, (v) the Plan is adequate for the Bell Pole Facility.

Shawn Gerard Horn, P.E.



Signature of Registered Professional Engineer

Registration No. 17207 State Minnesota

Date: 6-15-09

3.0 INTRODUCTION

The Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977, authorized the establishment of procedures, methods, equipment, and other requirements for the prevention and/or containment of discharges of oil and hazardous substances from vessels of onshore and offshore facilities. In partial response to this authorization, the U.S. Environmental Protection Agency (USEPA) issued Oil Pollution Prevention Regulations for Non-Transportation Related Onshore and Offshore Facilities on December 11, 1973 (effective on January 10, 1974). These regulations were published under title 40 of the Code of Federal Regulations (CFR), Part 112 and specifically outlined requirements for the preparation of a Spill Prevention, Control, and Countermeasure (SPCC) plan.

On July 17, 2002 the USEPA published modifications to the SPCC requirements in the Federal Register (Volume 67, No. 137, pages 47042-47152). These changes became effective on August 16, 2002 and require active facilities to amend their existing Plans by August 17, 2004 to ensure compliance. The USEPA subsequently extended the deadline to amend existing Plans and implement amendments by July 1, 2009. On December 5, 2008 the USEPA once again published modifications to the SPCC requirements in the Federal Register (Volume 73, No. 235, pages 74236-74323). Originally, these changes required active facilities to amend their existing Plans by July 1, 2009. Several deadline extensions to comply with the December 5, 2008 amendments have been granted since the amendment publication. The most current deadline is January 14, 2010, however; neither this extension delay, nor the December 5, 2008 final rule remove any regulatory requirement for owners or operators of facilities in operation before August 16, 2002, to maintain an SPCC Plan in accordance with the SPCC regulations. Therefore, this SPCC Plan has been revised in accordance with the revised regulations published on December 5, 2008.

The following sections of this Plan are presented in the sequence of the current amendment. The substantive requirements (§§112.7 and 112.8) are addressed in Sections 6 and 7, respectively. In these sections, the exact wording of the regulation is provided in *italics*, followed by an explanation of how the requirements have been addressed.

4.0 GENERAL APPLICABILITY: §112.1

The Oil Pollution Prevention Regulations (40 CFR Part 112) require preparation of an SPCC Plan for facilities that have discharged or could reasonably be expected to discharge oil into or upon navigable waters of the United States or adjoining shorelines. Specifically, §112.1(d)(2)(ii) requires an SPCC Plan to be developed for facilities where the aggregate aboveground storage capacity of oil is greater than 1,320 gallons (including containers and oil-filled equipment with thresholds of 55-gallons or greater). Because the Bell Pole Facility in New Brighton, Minnesota maintains an above ground oil storage capacity greater than 1,320 gallons, the Facility is required to develop, implement, and maintain an SPCC Plan. The Minnesota Pollution Control Agency (MCPA) defers to the Federal SPCC requirements; however, there are specific MCPA reporting requirements in the event of a discharge of oil (refer to Sections 5.2 and 6.11).

This SPCC Plan has been developed for the Bell Pole Facility in response to the regulations listed above. The purpose of this Plan is to identify sources of oil at the Bell Pole Facility and outline procedures to prevent the release of oil, oil products or hazardous substances to navigable waters of the United States.

A release of oil is considered a *discharge* under this Plan only if: the release is into or upon the navigable waters of the United States, adjoining shorelines, or waters contiguous with navigable waters of the United States. This is apparent if a release impacts surface water quality by causing a film, sheen, or discoloration of the water surface, or upon water or adjoining shorelines, or causes a sludge or emulsion to be deposited beneath the surface of the adjoining shorelines. Impacts to groundwater also apply if the groundwater is contiguous with navigable waters of the United States (i.e., groundwater discharges which contribute to the total volume of a surface water body that is itself contiguous with navigable waters of the United States).

All facilities regulated under 40 CFR Part 112 must conduct an initial screening to determine whether they are required to develop a Facility Response Plan (FRP) under §112.20. These requirements are not applicable to the Bell Pole Facility. The Substantial Harm determination checklist used to certify that these requirements are not applicable is provided in Appendix A. Because submittal of an FRP is not required, this SPCC Plan provides clear information and procedures for responding to discharges.

5.0 SPCC PLAN ADMINISTRATION: §§112.3, §112.4, AND §112.5

5.1 REQUIREMENT TO PREPARE: §112.3

This SPCC Plan was prepared to comply with the final rule (40 CFR Part 112) which was published on December 5, 2008. In accordance with §112.3(a), this Plan was revised and implemented prior to January 14, 2010. In accordance with §112.3(e)(1) and (2), a complete updated copy of this SPCC Plan will be maintained at the Bell Pole Facility. During normal working hours at the Facility, the Plan will be available to authorized representatives of Local, State, and Federal governing agencies for on-site review and a copy will be submitted if requested.

5.2 AMENDMENT BY REGIONAL ADMINISTRATOR: §112.4

In accordance with §112.4(a), whenever more than 1,000-gallons of oil have been *discharged* in a single incident or more than 42-gallons of oil have been *discharged* in each of two incidents over a consecutive 12-month period, Bell Pole will submit a report to the United States Environmental Protection Agency (USEPA) Regional Administrator (RA) within 60 days (refer to the definition of a discharge previously provided in Section 4). The report must contain the following information:

- §112.4(a)(1): Facility name;
- §112.4(a)(2): Name of designated person accountable for oil spill prevention at Facility;
- §112.4(a)(3): Facility location;
- §112.4(a)(4): Maximum storage capacity and daily throughput at Facility;
- §112.4(a)(5): Description of corrective action and countermeasures taken;
- §112.4(a)(6): Adequate description of the Facility including maps and flow diagrams;
- §112.4(a)(7): Cause of the discharge(s), including an analysis of the failed system;
- §112.4(a)(8): Description of additional preventive measures taken or contemplated to prevent recurrence; and
- §112.4(a)(9): Other pertinent information.

In accordance with §112.4(c), copies of the incident report will also be forwarded to the representative/case manager designated by the MPCA emergency response unit.

Should the RA subsequently propose by certified mail or personal delivery that this SPCC Plan be amended, in accordance with §112.4(e) Bell Pole will:

- Submit arguments and supporting information in response to the proposed amendments within 30 days; or
- Amend this SPCC Plan within 30 days and implement the amended Plan within six-months, unless otherwise authorized by the RA.

As required by §112.3(d), technical changes made to the Plan will be certified by a Professional Engineer.

5.3 SPCC PLAN AMENDMENT BY OWNER/OPERATOR: §112.5 AND §112.6

In accordance with §112.5(a), when there is a change in facility design, construction, operation, or maintenance that materially affects its potential for a discharge, Bell Pole will amend this SPCC Plan within six months of the change and implement the amended Plan within six months of its completion.

In accordance with §112.5(b), Bell Pole will review this Plan at least once every five years from the date of the last review. As a result of the review, the Plan will be amended within six months of the review if more effective prevention and control technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge. The amended Plan will be implemented within six months of its completion. The designated person accountable for oil spill prevention at the Facility (see Section 6.1) will document completion of each five-year review, sign a statement as to whether the Plan will be amended, and record the results in Appendix B.

As required by §112.3(d), technical changes made to the Plan will be certified by a Professional Engineer. A technical amendment is defined as a change that requires the application of good engineering practice. Non-technical changes include changes to the contact list, phone numbers, product changes if the new product is compatible with conditions of the existing tank and secondary containment; and any other changes which do not materially affect Bell Pole's potential to discharge oil. If Bell Pole is unsure whether the change is technical or non-technical, the amendment will be certified.

Technical amendments to the Plan may not be self certified by the Bell Pole Facility in accordance with §112.6 since the Facility does not meet the criteria for a "Tier I or Tier II Qualified Facility" contained in §112.3(g). Specifically, a Tier I qualified facility is one

that meets all of the following and a Tier II qualified facility must meet (ii) and (iii) as follows:

1. Has no individual aboveground oil storage container with a capacity greater than 5,000 U.S. gallons;
2. Has an aggregate aboveground storage capacity of 10,000 gallons or less; and
3. Has had no single discharge as described in § 112.1(b) exceeding 1,000 U.S. gallons or no two discharges as described in § 112.1(b) each exceeding 42 U.S. gallons within any consecutive twelve month period.

Bell Pole has a current oil storage capacity of 232,295 gallons and does not meet the conditions of a qualified facility; therefore it is required to maintain an SPCC Plan certified by a Professional Engineer.

In addition, Minnesota Statute Chapter 115E requires facilities that store oil or hazardous substances greater than 10,000 gallons, but less than 1,000,000 gallons to prepare an abbreviated Response Plan. Since Bell Pole has oil storage in this capacity range, it has authorized the preparation of a Response Plan.

6.0 SPCC PLAN GENERAL REQUIREMENTS: §112.7

If you are the owner or operator of a facility subject to this part you must prepare a Plan in accordance with good engineering practices. The Plan must have the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan. You must prepare the Plan in writing. If you do not follow the sequence specified in this section for the Plan, you must prepare an equivalent Plan acceptable to the Regional Administrator that meets all of the applicable requirements listed in this part, and you must supplement it with a section cross-referencing the location of requirements listed in this part and the equivalent requirements in the other prevention plan. If the Plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, you must discuss these items in separate paragraphs, and must explain separately the details of installation and operational start-up.

Section 6 of this Plan presents facility-specific details associated with the general requirements for SPCC Plans outlined in §112.7. As previously indicated in Sections 1, 2, and 3, this SPCC Plan has been prepared in accordance with good engineering practice, with management approval at a level with authority to commit the necessary resources for full implementation, and in the sequence of the rule. This Plan calls for additional measures not yet fully implemented, but will be implemented by July 1, 2009. The details of these measures are discussed in Section 6.14.

6.1 GENERAL FACILITY INFORMATION

Facility name:	Bell Lumber and Pole Company
Facility type:	Wood treatment facility
Facility location:	3778 First Street Northwest New Brighton, MN 55112 Latitude: 45° 03' 09" Longitude: -93° 11' 47"
Owner name and address:	Tom Bell 3778 First Street Northwest New Brighton, MN 55112
Designated person accountable for oil spill prevention at facility:	Rick Bleskey, Facility Manager (Emergency Coordinator) (651) 633-4334

The Facility has not experienced a reportable oil spill event during the past 12 months.

6.2 GENERAL FACILITY DESCRIPTION

The Bell Pole Facility treats wood utility poles with a solution of pentachlorophenol (PCP) and fuel oil. Pole treatment activities are located within the Wood Treatment Building. Bell Pole also treats extracted groundwater and processes pole treatment waste water inside the Water Treatment Building. Bell Pole is located at 778 First Street Northwest, New Brighton, Minnesota. The location of Bell Pole is shown on Figure 6.1.

6.3 SPCC PLAN CONFORMANCE AND DEVIATIONS: §112.7(a)(1) AND (2)

§112.7(a)(1): Include a discussion of your facility's conformance with the requirements listed in this part.

§112.7(a)(2): Comply with all applicable requirements listed in this part. Except as provided in § 112.6, your Plan may deviate from the requirements in paragraphs (g), (h)(2) and (3), and (i) of this section and the requirements in subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and §§ 112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.9(d)(3), 112.10(c), 112.12(c)(2), and 112.12(c)(11), where applicable to a specific facility, if you provide equivalent environmental protection by some other means of spill prevention, control, or countermeasure.

Where your Plan does not conform to the applicable requirements in paragraphs (g), (h)(2) and (3), and (i) of this section, or the requirements of subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and §§ 112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c), you must state the reasons for nonconformance in your Plan and describe in detail alternate methods and how you will achieve equivalent environmental protection. If the Regional Administrator determines that the measures described in your Plan do not provide equivalent environmental protection, he may require that you amend your Plan, following the procedures in §112.4(d) and (e).

6.4 FACILITY LAYOUT: §112.7(a)(3)

§112.7(a)(3): Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each fixed oil storage container and the storage area where mobile or portable containers are located. The facility diagram must identify the location of and mark as "exempt" underground tanks that are otherwise exempted from the requirements of this part under § 112.1(d)(4), and produced water containers and any associated piping and appurtenances downstream from the container, that are otherwise exempted from the requirements of this part under § 112.1(d)(12). The facility diagram must also include all transfer stations and connecting pipes, including intra-facility gathering lines that are otherwise exempted from the requirements of this part under § 112.1(d)(11).

The physical layout of the Bell Pole Facility is shown in Figure 6.2 with more detailed floor plans of specific buildings shown in Figures 6.3, 6.4, and 6.5. The detailed floor plans depict both the SPCC regulated storage areas as well as the containers and appurtenances which are exempt from this Plan. SPCC regulated storage areas are described in the legend of each Figure and in Table 6.1 (Oil Storage Inventory).

6.5 OIL STORAGE CAPACITY: §112.7(a)(3)(i)

You must also address in your plan:

§112.7(a)(3)(i): The type of oil in each fixed container and its storage capacity. For mobile or portable containers, either provide the type of oil and storage capacity for each container or provide an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities;

A summary of the substance, container type, and container capacities applicable to this Plan is provided in Table 6.1 and depicted on Figure 6.2 through Figure 6.5.

Although oil-filled electric equipment are not considered containers as defined by §112.2, the preamble of the new rule (pp 47054-47055) indicates that applicability criteria such as oil storage capacity and potential for a discharge location still apply and the prevention of discharges from such equipment still falls within the scope of the SPCC rule.

The Facility has one pad mounted and several pole mounted transformers which are owned and serviced by the Excel Energy. The pad-mounted transformer location is

depicted on Figure 6.3, while the pole mounted transformers are situated on the perimeter of the Site and are not shown on a Figure .

Multiple pieces of oil-filled operational equipment are present on site (i.e., air compressors, weed trimmers, lawn mowers, and pressure washers). These pieces of equipment store less than 55 gallons of oil and are exempt from SPCC regulations.

6.6 DISCHARGE PREVENTION MEASURES: §112.7(a)(3)(ii)

§112.7(a)(3)(ii): You must also address in your Plan discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);

Bell Pole relies on a number of measures to aide in the prevention of a discharge. The following practices have been implemented in order to reduce the potential for discharge.

- Routine maintenance and inspection is performed by trained personnel on storage tanks, valves, pumps, piping, sumps, secondary containment structures and/or drip-pans as warranted.
- Routine inventory of sorbent materials.
- Waste materials are immediately transferred to the used oil drums established in designated areas of the Wood Treatment Building and are properly disposed.
- Routine maintenance and inspection of storm water ponds.
- Good housekeeping practices are designed to maintain a clear and orderly facility, which will reduce the potential for oil to come into contact with storm water, soils, or groundwater.
- Written oil transfer procedures are followed. Aboveground storage tanks are periodically refilled by tanker trucks and mobile equipment is refueled from the tanks during which the procedures in Appendix C are followed.

Inspections are performed according to pre-determined schedules based on engineering knowledge and operational experience depending on system equipment and processes. Each inspection item has the content and frequency necessary to alert facility personnel prior to the development of a release. The Emergency Coordinator and/or his designee will evaluate and assess each item indicating a potential deficiency, malfunction, equipment deterioration, or operator error through regular observation of the processes and procedures. The level of response and its timing is determined by the nature and

severity of the problem identified with the protection of personnel and the prevention of adverse environmental impact being a paramount concern.

6.7 DISCHARGE OR DRAINAGE CONTROLS: §112.7(a)(3)(iii)

§112.7(a)(3)(iii): You must also address in your Plan discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge;

Secondary containment structures provide all indoor regulated storage areas with sufficient discharge control to prevent the contents of the largest tank from reaching the outside of the building and potentially causing a *discharge*. Tanks WA1 and WA2 are equipped with automated alarms and shut-off controls that limit the tank storage capacity to 36,000 gallons. One gasoline AST is located outdoors near the west side of the Maintenance Shop. The 275-gallon tank is double-walled and equipped with a leak detection system. In the unlikely event that an oil spill reaches the outside of a building, it will be confined to the property by on-site retention ponds.

There are no building floor drains in operation areas; however, there is a floor drain in the Maintenance Shop which is equipped with an oil separator prior to discharge into the sanitary sewer. Three retention ponds with a total storage capacity of approximately 71,000 gallons exist on site as shown on Figure 6.2. Stormwater inlets located along the northern borders of the property feed into retention pond #3 at the northern most portion of the Facility (approximate capacity: 45,000 gallons). The retention pond is equipped with an oil separation structure prior to discharge into the city stormwater sewer system.

Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers); discharge or drainage controls such as secondary containment; procedures for control of discharge; and countermeasures for discharge discovery, response, and cleanup are discussed below or outlined in Appendix C. Bell Pole is committed to protecting the environment from oil spills and/or releases as evidenced by the engineered barriers and spill containment equipment.

A small oil spill occurring at the point of use would be contained using sorbent materials located at the respective building. Large indoor spills would be contained by the secondary barrier then pumped from the sump found in each area for reuse or disposal. Outdoor spills would be contained using sorbent material and by the construction of a

temporary berm if necessary. Temporary berms and absorbent materials would accomplish containment of potential leakage from a facility transformer.

If spilled material is discharged from the Facility, a contractor will be mobilized and regulatory agencies notified. A list of Bell Pole contact personnel, state and federal emergency numbers and contract services is provided in Appendix D. The products stored at the Bell Pole Facility (oils and fuels) are non-corrosive materials and are compatible with the materials with which the storage containers and containment structures at the Facility are constructed.

6.8 COUNTERMEASURES FOR DISCHARGE DISCOVERY, RESPONSE, AND CLEANUP: §112.7(a)(3)(iv)

§112.7(a)(3)(iv): You must also address in your Plan countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor);

As part of routine facility procedures, visual exterior inspections of the oil storage containers and equipment are made on a routine basis (weekly minimum) for signs of deterioration or leaks. Deficiencies noted from these examinations are entered on a Facility Inspection Form (see Appendix E) and corrected in a timely manner. Completed Inspection Forms are kept in a log book in the Plant Manager's Office. In addition to the routine inspections, the oil storage equipment is inspected every month according to the written procedures outlined in Section 6.16 of this Plan.

In the event of a release, the Facility has trained personnel and equipment available to contain and clean-up minor volumes of oil. On-site equipment and materials include floor dry, rakes, shovels, sump pumps, wood shavings, front-end loader in bucket, etc., that may be used to dike, contain, and remove minor releases. A summary of the location and quantity of various spill control equipment at the Facility is summarized in Table 6.2.

In case of a larger release, specific response procedures have been developed (Section 6.12). As part of these procedures, external resources (contractors) have been identified to assist facility personnel. To ensure the commitment of these external resources, Bell Pole has Bellaire and Determan Brownie, Inc. as approved vendors. These contractors have the capabilities to provide emergency response, industrial power vacuuming, building decontamination, excavation/earthmoving, and waste transportation and disposal services.

6.9 RECOVERED MATERIALS DISPOSAL: §112.7(a)(3)(v)

§112.7(a)(3)(v): You must also address in your Plan methods of disposal of recovered materials in accordance with applicable legal requirements;

After use, spent absorbent materials are disposed in accordance with all applicable local, state, and federal regulations under the direction of the Facility Manager. Specifically, clean up materials are placed in a disposal drum, and the disposal is arranged with Determan Brownie, Inc.

In the event of an oil spill that causes contamination, the contaminated material will be excavated, to avoid stormwater contamination containerized, and disposed of in accordance with applicable local, state, and federal regulations under the direction of the Facility Manager.

6.10 CONTACT LIST AND NOTIFICATION PHONE NUMBERS: §112.7(a)(3)(vi)

§112.7(a)(3)(vi): You must also address in your Plan contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b).

The Bell Pole Emergency Contact List is included as Appendix D.

6.11 REPORTING AND NOTIFICATION PROCEDURES: §112.7(a)(4)

§112.7(a)(4): Unless you have submitted a response plan under §112.20, provide information and procedures in your Plan to enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge, the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and, the names of individuals and/or organizations who have also been contacted.

In the event of a discharge, the following information should be relayed to those on the contact list:

- Facility Information: Bell Lumber and Pole Company
776 1st Street Northwest
New Brighton, Minnesota 55112
(651) 270-9760;
- Date and time of the discharge;
- Type of material discharged;
- Estimates of the quantity discharged;
- Estimates of the quantity discharged into or upon the navigable waters of the United States, adjoining shorelines, or waters contiguous with navigable waters of the United States, including any quantity discharged to groundwater if the groundwater is contiguous with navigable waters of the United States (i.e., groundwater discharges to/contributes to the total volume of a surface water body that is itself contiguous with navigable waters of the United States);
- Source of the discharge;
- Description of all affected media;
- Cause of the discharge;
- Damages or injuries;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation is needed; and
- Names of individuals and organizations that have been contacted.

6.12 OIL SPILL RESPONSE PROCEDURES: §112.7(a)(5)

§112.7(a)(5): Unless you have submitted a response plan under §112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.

For any spill, the potential fire, electrical, or other health hazard shall be immediately evaluated. If the situation appears dangerous, the area should be evacuated and the Fire Department/Police Department (911) notified. In the Wood Treatment Building, the telephone is located in the control room. Water Treatment Building telephones are

located in the break room (upstairs) or the Maintenance Shop (downstairs). Some personnel are also equipped with 2-way radios linked to the main office.

If the situation does not appear to be dangerous, then immediate steps shall be taken to control or minimize the spill as required (close valves, pump oil out of the ruptured tank, etc.).

Once immediate measures have been taken, the supervisor and/or people listed on the Emergency Contact List (Appendix D) shall be contacted to obtain additional help. The most senior supervisor on the scene has authority to contact outside help as required and expend the funds to control the situation.

In the event of an oil spill (e.g., equipment or container leakage or waste oil tank failure) at the Facility, the following general response procedures should be observed. Specific response procedures will be determined by the nature of the spill event and will be directed by the Facility Manager or his designee, in part, based upon established Facility emergency response procedures. The electrical utility company will be contacted by the Facility in the event of a transformer release of oil.

1. Stop the source of the oil spill
 - Set the container upright or the leak side up
 - Stop transfer
2. Obstruct flow of oil spill
 - Small spills – Use available absorbent materials
 - Large spills – Use absorbent materials to block building doorways for an oil spill within a building. Construct temporary berms or other barriers with available materials for an oil spill outdoors.
3. Isolate the oil spill from potential stormwater contact and verify no off site release.
4. Immediately notify the Emergency Coordinator (see Section 6.1)

The primary responsibilities of the Facility Emergency Coordinator in the event of an oil spill will be the following:

1. Confirm that the source of the oil spill is closed;
2. Confirm that the spilled oil is contained and isolate it from stormwater;
3. Determine the volume and location of the spilled oil;

4. Determine company and regulatory reporting requirements; and
 - If any oil product is discharged into the sanitary sewer drains, MCES will be immediately notified.
 - If any oil product enters any navigable waterway or tributary, the National Response Center and the Minnesota Duty Officer will be immediately notified.
5. Direct and complete the cleanup of the oil spill and dispose of the spill materials.

Indoor Site-Specific Spills

Spills will drain towards the sump system inside the respective building.

Small spills, those not exceeding the volume of the sumps, can be retrieved by using the sump pump, or other portable pumps, and transferred to the oil/water decant tank. An alternative method is to use the vacuum system to pull spilled oil to the combo tank (penta mix tank). In the Water Treatment Building, sump pumps are located in each sump that will pump liquid into the production tank or air floatation unit.

In the event of a large spill, all electric circuits shall be turned off to prevent potential fires. Outside contractors as needed should be contacted to remove the spilled oil. Appendix D lists the potential outside contractors needed.

Small leaks from leaking pipes, valves, sight glasses and filters shall be repaired as soon as detected. Use protective clothing during all phases of clean-up, including boots, gloves, trousers and goggles. Table 6.2 lists the locations of spill control equipment.

In the event that a tank ruptures, tanker truck(s) from an outside contractor may need to be called in to pump up the liquid. Appendix F provides documentation of the pre-arranged agreement for these companies to respond to a large spill.

Outdoor Site-Specific Spills

The worst case discharge for the Bell Pole Facility would be the loss of the entire contents of the 48,000-gallon work tank #2 in the Wood Treatment Building or the loss of one of the 40,000-gallon tanks in the Water Treatment Building. In each of these cases, simultaneous failure of the secondary containment structure would have to occur. Review of surface water runoff patterns, Figure 6.6 indicates that oil from these areas would flow in one of two directions: either east toward Ponds #1 or #2; or northwest toward the stormwater drain. In each case, flow would then reach Pond #3 in the

northern most portion of the property and overflow into the storm system and discharge to Hansen Creek.

Bell Pole owns and operates heavy equipment that is capable of moving earth in order to contain an outside spill and to recover, to the maximum extent possible, with the use of a vacuum tanker. If the spill is large and spreading, earth or wood chips (available on site from the Shaver Building) may be used to berm an area to control and contain the spill. Once free liquid has been recovered, use absorbent pads to mop up remaining free residue. Lastly, remove contaminated soil and wood chips and place in 55-gallon steel drums, other containers or stock pile with appropriate liner material. Affix hazardous waste labels to the drums and record the date on the label. Record in the log book the amount of oil recovered and the amount of contaminated debris recovered.

Temporary berms and absorbent materials would accomplish containment of potential leakage from a facility transformer. Excel Energy services all of the transformers.

There are no building floor drains in operation areas; however, there is a floor drain in the shop which is equipped with an oil separator prior to discharge into the sanitary sewer. Three retention ponds exist on site as shown on Figure 6.1. Stormwater inlets located along the northern borders of the property feed into retention pond #3 at the northern most portion of the Facility. The retention pond is equipped with a oil separation structure prior to discharge into the city sewer system.

6.13 DISCHARGE ANALYSIS: §112.7(b)

§112.7(b): Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in your Plan a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.

Potential spill scenarios exist based upon the location of the stored materials. It is unlikely, with secondary containment structures in place, that any spill would flow to the Site drainage areas, however drainage patterns at the Facility are depicted on Figure 6.6.

Nearby Navigable Water Which Could Be Impacted

Review of surface water runoff patterns indicates that oil from the Site would flow in two directions depending on the location of a spill. In the north portion of the Wood Treatment Building flow would initially tend to be easterly toward the east retention pond (see Figure 2.2), then north to the stormwater retention pond on the north end of the property. This pond contains an overflow into a storm drain that discharges into Hansen Creek.

A spill in the southern portion of the Wood Treatment Building or in the Water Treatment Building would tend to flow southwesterly toward First Street then west toward County Ditch #2.

6.14 SPILL CONTAINMENT: §112.7(c)

§112.7(c): Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in § 112.1(b), except as provided in paragraph (k) of this section for qualified oil-filled operational equipment, and except as provided in § 112.9(d)(3) for flowlines and intra-facility gathering lines at an oil production facility. The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank, will not escape the containment system before cleanup occurs. In determining the method, design, and capacity for secondary containment, you need only to address the typical failure mode, and the most likely quantity of oil that would be discharged. Secondary containment may be either active or passive in design. At a minimum, you must use one of the following prevention systems or its equivalent:

(1) For onshore facilities: (i) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (ii) Curbing or drip pans; (iii) Sumps and collection systems; (iv) Culverting, gutters, or other drainage systems; (v) Weirs, booms, or other barriers; (vi) Spill diversion ponds; (vii) Retention ponds; or (viii) Sorbent materials.

(2) For offshore facilities: (i) Curbing or drip pans; or (ii) Sumps and collection systems.

Each oil storage aboveground storage tank at the Bell Pole Facility is equipped with secondary containment. Spill containment at the Facility is described below:

Regulated storage points WO1 through WO15 (as listed in Table 6.1) are located inside the Wood Treatment Building. Failure of the largest tank (48,000 gallons) will be contained within the building by a series of interconnected concrete containment areas that serve all the tanks in the building. Ultimately, all content of tank containers would

drain into the treatment center room and the tram transfer bay which have a cumulative volume of over 500,000 gallons.

Regulated storage points WA1 through WA5 (as listed in Table 6.1) are located inside the Water Treatment Building. Failure of the largest tank (36,000 gallons) will be contained within the Building by the containment area located around the tanks including a net volume of 40,052 gallons. This tank has a high level shut-off switch which prevents it from being filled to greater than 27 ft or approximately 36,000 gallons. Smaller tanks in the Water Treatment Building will be contained by the concrete floor which drains into concrete sump holes and is pumped back into the Process Tank. In the event the alarm and shutoff system fails, any liquid escaping the Building will be contained by Pond 3.

Regulated storage point MS1 is located outside and near the eastern side of the Maintenance Shop. The gasoline AST is double walled and equipped with a leak detection system.

Regulated storage points MS2 through MS8 (as listed in Table 6.1) are located inside the Maintenance Shop. Failure of the largest tank (970 gallons) would be contained within the building by the 300-gallon oil/water separator and concrete floors which are center sloping. In addition, the drums which are stored near the west wall are situated on spill pallets which have a capacity of 60 gallons.

Regulated storage point S1 (as listed in Table 6.1) are located inside the Shaver Building. Failure of the tank would be contained within the building by the concrete floor and doorway berm.

All containment areas are sufficiently impervious to contain fluids until they can be recovered.

6.15 SPILL CONTAINMENT PRACTICABILITY: § 112.7(d)

§112.7(d): If you determine that the installation of any of the structures or pieces of equipment listed in paragraphs (c) and (h)(1) of this section, and §112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c) to prevent a discharge as described in §112.1(b) from any onshore or offshore facility is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the

valves and piping; and, unless you have submitted a response plan under §112.20, provide in your Plan the following:

- (1) An oil spill contingency plan following the provisions of part 109 of this chapter*
- (2) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.*

Section 1.0 provides the written commitment by Bell.

6.16 INSPECTIONS, TESTS, AND RECORDS: § 112.7(e)

§112.7(e): Inspections, tests, and records. Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

As part of day-to-day operations, operators visually inspect the exterior of the storage containers and equipment for signs of deterioration or leaks. Qualified facility personnel perform, at a minimum, weekly inspections of all oil storage containers, equipment, associated hoses and valves, and secondary containment areas at Bell Pole for signs of deterioration or leaks. Observations of the transformers include corrosion, staining or leaking. Pad-mounted transformers are inspected weekly by facility personnel as part of facility operations. Inspections of new and used oil lubricant drums, the small containers and their respective secondary containment units (e.g., spill pallet, retaining walls) are inspected at least weekly for integrity, corrosion and leaking as part of facility operations. Process areas are also included in these inspections. The stormwater retention area is also inspected monthly and prior to discharging for integrity and drain valve closure. Any deficiencies noted during these inspections will be documented and corrected in a timely manner. All records of inspections will be kept on file at the Bell Pole Facility for a period of not less than three years. Records of inspections and tests under usual and customary business practices will suffice.

Each AST is tested for integrity whenever material repairs are made. Integrity testing will be conducted on all tanks which cannot be viewed from all sides including the bottom. Ultrasonic Thickness (UT) testing shall be performed by a API 653 certified inspector at a minimum of every five to ten years. Inspection records used for the

purpose of integrity testing are maintained at the Facility. The UT inspections are documented by the certified inspector and maintained on file along with the Facility Inspection Forms (Appendix E).

Visible oil leaks will be reported to the Plant Manager and repaired immediately. Any spilled or leaked oil is cleaned up immediately using the cleanup supplies are located in the Wood Treatment and Water Treatment Buildings and is disposed of as required.

6.17 PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES: §112.7(f)

§112.7(f): Personnel, training, and discharge prevention procedures.

(1) At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.

(2) Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.

(3) Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.

The Facility Manager/Emergency Coordinator (Section 6.1) is responsible for the coordination of facility employee training with respect to this SPCC Plan and is also the designated person in charge of discharge prevention. At a minimum, training is conducted annually or when new spill regulations are promulgated, existing operating systems are modified, personnel responsibilities change, or the SPCC Plan is amended. All oil handling employees are required to have spill prevention training, which includes a complete review of the Bell Pole Facility SPCC Plan and Hazard Communication. Training includes operation and maintenance of equipment discharge prevention, loading and unloading procedures, discharge procedure protocols, and applicable pollution control laws, rules, and regulations. The training will also include descriptions of known oil discharges, failures, or malfunctions of any spill equipment or procedures and any recently developed precautionary oil spill prevention measures.

Spill response refresher training is conducted annually on what to do in case of a spill, where the cleanup material and equipment is located, items that make up a complete

spill kit, and discharge prevention. Training acknowledgement forms (Appendix G), training summaries, and other training records will be maintained in the Plant Manager's Office for a period not less than three years.

Facility management shall schedule and conduct spill prevention briefings as needed for operating personnel at intervals more frequent than the annual training to ensure adequate understanding of this SPCC Plan. Additionally, personnel roles and responsibilities in the event of a spill are outlined in Table 6.3.

6.18 SECURITY: §112.7(g)

§112.7(g): Security (excluding oil production facilities). Describe in your Plan how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; and address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.

The Facility is not manned at all times. When personnel are not present, all buildings are locked. Lighting is adequate to detect spills if they occur during nighttime hours and to prevent vandalism.

The only outdoor AST is equipped with a dispenser nozzle. Gasoline is dispensed from the tank by an electric pump which must be switched on inside the building for use. When not in use the electric pump is switched in the off position. In addition, an emergency shut off switch is located outside the building near the tank. All other ASTs are located inside buildings which are locked during non-production hours.

**6.19 FACILITY TANK CAR AND TANK TRUCK
LOADING/UNLOADING: §112.7(h)**

§112.7(h): Facility tank car and tank truck loading/unloading rack (excluding offshore facilities, farms, and oil production facilities).

"Farm" means a facility on a tract of land devoted to the production of crops or raising of animals, including fish, which produced and sold, or normally would have produced and sold, \$1,000 or more of agricultural products during a year.

(1) Where loading/unloading rack drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading/unloading racks. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.

Any spillage during loading or unloading would likely be the result of a tank overfilling. If this or any other type of spill occurred, sorbent material from the spill kit will be employed immediately and if needed, an earthen dam would be constructed to contain the spill. An operator shall remain present throughout all loading and unloading operations and respond immediately should a spill occur. Oil Transfer Procedures (Appendix C) will be followed in order to minimize the occurrence of such a spill as well as increase reaction time. Where practical, drip pans or containers are used when connecting and disconnecting hoses.

All bulk deliveries to the Wood Treatment Building are off loaded onto a concrete apron and basin area (the South Loading Bay) where spillage would be contained.

(2) Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks or vehicle brake interlock system in the area adjacent to a loading/unloading rack, to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.

In accordance with the Oil Transfer Procedures (Appendix C) wheels will be chocked throughout the loading and unloading process.

(3) Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

Professionally recognized suppliers and transporters following U.S. DOT Regulations shall accomplish all bulk deliveries. A Bell Pole employee or a fueling operator who has knowledge of the spill kits and their location will be present to observe all fuel loading and unloading operations as outlined in the Oil Transfer Procedures in Appendix C and are posted near each station.

6.20 BRITTLE FRACTURE ANALYSIS: §112.7(i)

§112.7(i): *If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to*

brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.

Field constructed tanks at Bell Pole have not failed in the past. They are inspected weekly and undergo UT inspection every 5 to 10 years or when material repairs are made.

6.21 APPLICABLE REQUIREMENTS: §112.7(j)

§112.7(j): In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines.

Sections 6 and 7 of this Plan provide detailed discussions of conformance with the applicable requirements and other effective discharge prevention used at the Facility. The Minnesota Department of Natural Resources (MNDNR) defers to the Federal SPCC requirements.

6.22 OIL-FILLED OPERATIONAL EQUIPMENT: §112.7(K)

§112.7(k) Qualified Oil-filled Operational Equipment. The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section.

(1) Qualification Criteria – Reportable Discharge History: The owner or operator of a facility that has had no single discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan certification date, or since becoming subject to this part if the facility has been in operation for less than three years (other than oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war or terrorism); and

(2) Alternative Requirements to General Secondary Containment. If secondary containment is not provided for qualified oil-filled operational equipment pursuant to paragraph (c) of this section, the owner or operator of a facility with qualified oil-filled operational equipment must:

(i) Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge; and

(ii) Unless you have submitted a response plan under §112.20, provide in your Plan the following:

(A) An oil spill contingency plan following the provisions of part 109 of this chapter.

(B) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

The oil-filled equipment located at the Bell Pole Facility include pad mounted and pole mounted electrical transformers which are noted on the Figure s. The requirements outlined in §112.7(k)(2)(i), (A), and (B) have been addressed in this plan.

7.0 REQUIREMENTS FOR ONSHORE (NON-PRODUCTION) FACILITIES: §112.8

If you are the owner or operator of an onshore facility (excluding a production facility), you must:
(a) meet the general requirements for the Plan listed under §112.7, and the specific discharge prevention and containment procedures listed in this section.

As previously indicated in Section 6.3, this SPCC Plan conforms with and does not deviate from the requirements of CFR 40 §112.7. Section 7 of this Plan presents facility-specific details associated with the requirements for on shore non-production facilities outlined in §112.8.

7.1 FACILITY DRAINAGE: §112.8(b)

§112.8(b)(1): Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged.

§112.8(b)(2): Use valves of manual, open-and- closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an on-site wastewater treatment plant, you must inspect and may drain uncontaminated retained stormwater, as provided in paragraphs (c)(3)(ii),(iii),and (iv)of this section.

§112.8(b)(3): Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding.

§112.8(b)(4): If facility drainage is not engineered as in paragraph (b)(3)of this section, equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility.

§112.8(b)(5): Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two "lift " pumps and permanently install at least one of the pumps. Whatever techniques you use, you must engineer

facility drainage systems to prevent a discharge as described in §112.1(b) in case there is an equipment failure or human error at the facility.

Review of surface water runoff patterns indicates that oil from the Site would flow in two directions depending on the location of a spill. In the north portion of the Wood Treatment Building flow would initially tend to be easterly toward the east retention pond (see Figure 2.2), then north to the stormwater retention pond on the north end of the property. This pond contains an overflow into a storm drain that discharges into Hansen Creek.

A spill in the southern portion of the Wood Treatment Building or in the Water Treatment Building would tend to flow southwesterly toward First Street then west toward County Ditch #2

All oil except the 275-gallon , double walled, gasoline tank is stored indoors. With the exception of the sanitary and storm sewer system, there is no regular drainage from the Facility. Other methods utilized at the Facility to prevent oil from reaching navigable waters in the event of equipment failure or human error include:

1. The Facility does not have outdoor oil storage except the 275-gallon , double walled, gasoline tank. All indoor above ground storage tanks (ASTs) have dry sumps and secondary containment into which spills could be pumped out into other tanks or trucks for disposal. There are no drain valves on the secondary containment systems.
2. There are no storage areas that could flow directly to ponds or lagoons.
3. Any spills that would occur at the Facility would be confined within the Facility. Loading/unloading of spillable materials takes place in the truck well, which is drained by a small sump and discharged to the main sump. The transfer bay contains a gutter along the entire east wall with a sump and pump piped to the decant tank. The floor of the transfer bay slopes toward the transfer bay gutter. The transfer deck is used to move poles in and out of the treatment cylinders and is fitted with a drip pan that also slopes toward the transfer bay gutter.

Facility drainage systems have been adequately engineered to prevent oil from reaching navigable waters.

7.2 BULK STORAGE CONTAINERS: §112.8(c)

§112.8(c)(1): Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.

The products stored at Bell Pole with their storage conditions (temperature and pressure) are compatible with the materials of which the storage containers and containment structures are constructed.

§112.8(c)(2): Construct all bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation.

You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.

Visual inspections are conducted at least weekly to insure integrity of the aboveground containers.

§112.8(c)(3): Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you: (i) Normally keep the bypass valve sealed closed. (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b). (iii) Open the bypass valve and reseal it following drainage under responsible supervision; and (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with §§122.41(j)(2) and 122.41(m)(3) of this chapter.

Bell Pole has no outdoor secondary containment areas subject to precipitation, therefore; the requirements of §112.8(c)(3) do not apply.

§112.8(c)(4): Protect any completely buried metallic storage tank installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.

Bell Pole has no known buried metal storage tanks as addressed by this SPCC Plan, therefore the requirements of §112.8(c)(4) do not apply.

§112.8(c)(5): Not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions.

Bell Pole has no known partially buried or bunkered metal storage tanks; therefore, the requirements of §112.8(c)(5) do not apply.

§112.8(c)(6): Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph.

Although a method of physical integrity testing is required in conjunction with visual inspection, the preamble of the new rule indicates that small containers for which internal corrosion poses minimal risk of failure, which are inspected at least monthly, and for which all surfaces are observable (the container has no contact with the ground), visual inspection may suffice. Consequently, integrity testing of the lubricating oil storage drums in the compressor building will be limited to visual inspection. These containers are staged on secondary containment pallets (i.e., they are not in contact with the ground) and are visually examined on a routine basis (cursory inspections) and monthly basis (written inspection procedures) for signs of deterioration or leaks. Furthermore, these containers are temporary and are frequently replaced.

For all other oil and fuel tanks, visual inspections must be combined with other non-destructive shell testing and comparison records must be kept. The tanks will be inspected and Ultrasonic Thickness (UT) testing will be carried out by a certified API inspector every five to ten years and maintained on file at the Facility.

§112.8(c)(7): Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an

open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.

There are no internal heating coils at the Bell Pole, therefore the requirements of §112.8(c)(7) do not apply.

§112.8(c)(8): Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices: (i)High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice. (ii)High liquid level pump cutoff devices set to stop flow at a predetermined container content level. (iii)Direct audible or code signal communication between the container gauger and the pumping station. (iv)A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers. (v)You must regularly test liquid level sensing devices to ensure proper operation.

Professionally recognized suppliers and transporters following U.S. DOT Regulations shall accomplish all bulk deliveries. The bulk trucks used to accomplish these deliveries are equipped with dispenser nozzles which automatically shut off in order to prevent tank overflow. Furthermore, the operator is required to maintain constant attendance during fueling operations in case of equipment failure.

§112.8(c)(9): Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b).

The water treatment system is observed often by the operator and is also equipped with high level and low level sensors to prevent overflow. Additionally, containment area are equipped with float switches to detect and alert personnel in case of overflow.

§112.8(c)(10): Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.

Visible oil leaks will be promptly corrected by trained facility personnel in accordance with the spill response procedures presented in Section 6.12.

§112.8(c)(11): Position or locate mobile or portable oil storage containers to prevent a discharge as described in § 112.1(b). Except for mobile refuelers and other non-transportation-related tank trucks, you must furnish a secondary means of containment, such as a dike or catchment basin,

sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

Bell Pole has portable oil storage containers, including 55 gallons drums, however; they are stored indoors and within the confines of the secondary containment structure.

7.3 FACILITY TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESS: §112.8(d)

§112.8(d)(1): Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage.

There are no known buried or underground oil piping operations associated with the Bell Pole Facility. Therefore, this rule is not applicable.

§112.8(d)(2): Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time.

Terminal connections in the tank truck loading/unloading areas are capped when not in use.

§112.8(d)(3): Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.

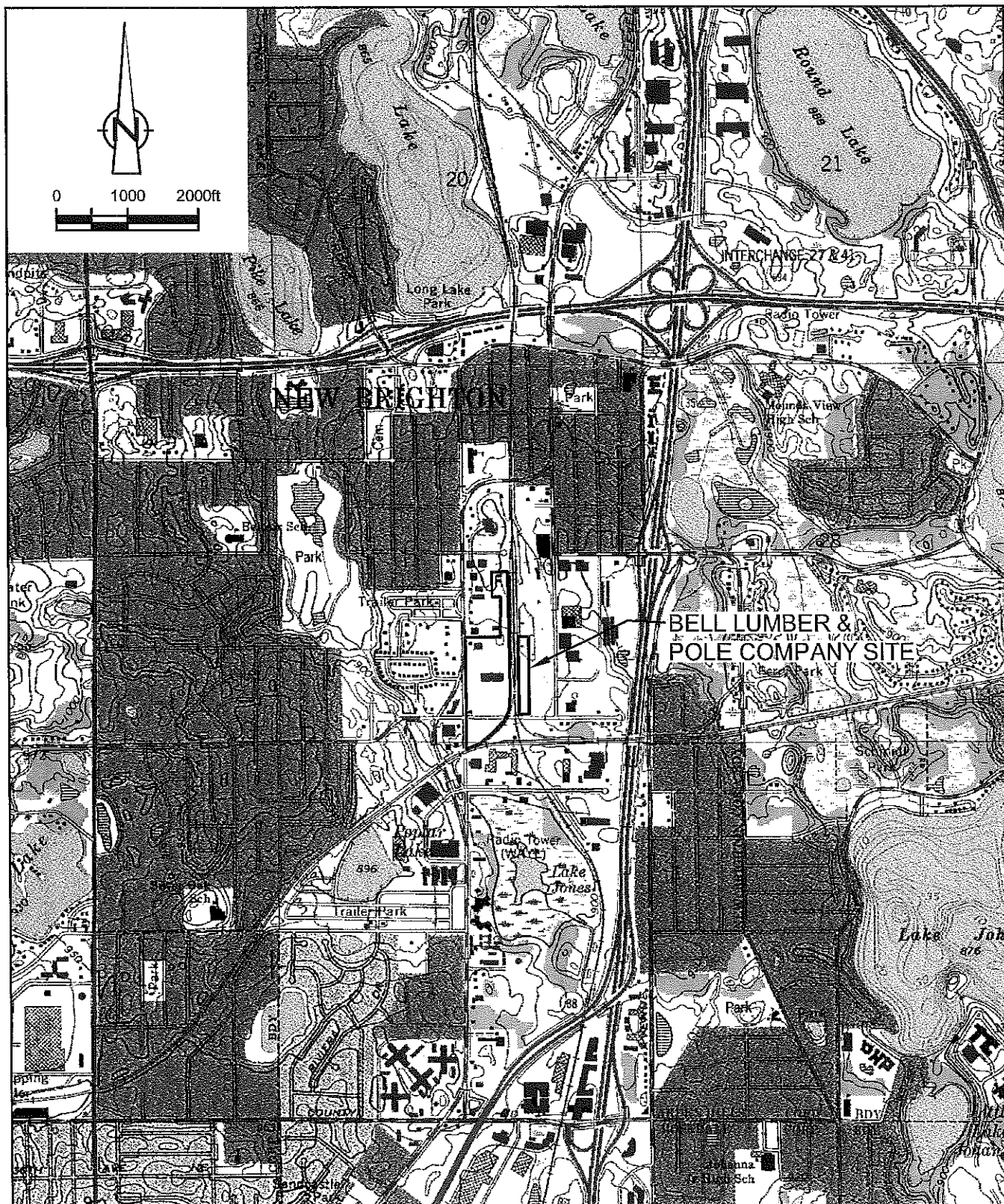
Transfer pipe supports are located indoors and are constructed of steel, wood, or concrete supports which minimize wear and corrosion.

§112.8(d)(4): Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.

All pipes, valves, and appurtenances are inspected weekly and deficiencies are noted on the Facility Inspection Form (Appendix E).

§112.8(d)(5): Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.

All vehicles entering the facility are made aware of the aboveground oil pipes and are required to use a spotter when positioning to load or unload.



SOURCE: USGS TOPOGRAPHIC MAP
NEW BRIGHTON, MINNESOTA.

figure 6.1
SITE LOCATION
Bell Lumber & Pole Co.



8.0 REQUIREMENTS FOR ONSHORE OIL PRODUCTION FACILITIES: § 112.9

Bell Pole is not an onshore oil production Facility. Consequently, the provisions in §CFR 112.9 do not apply.

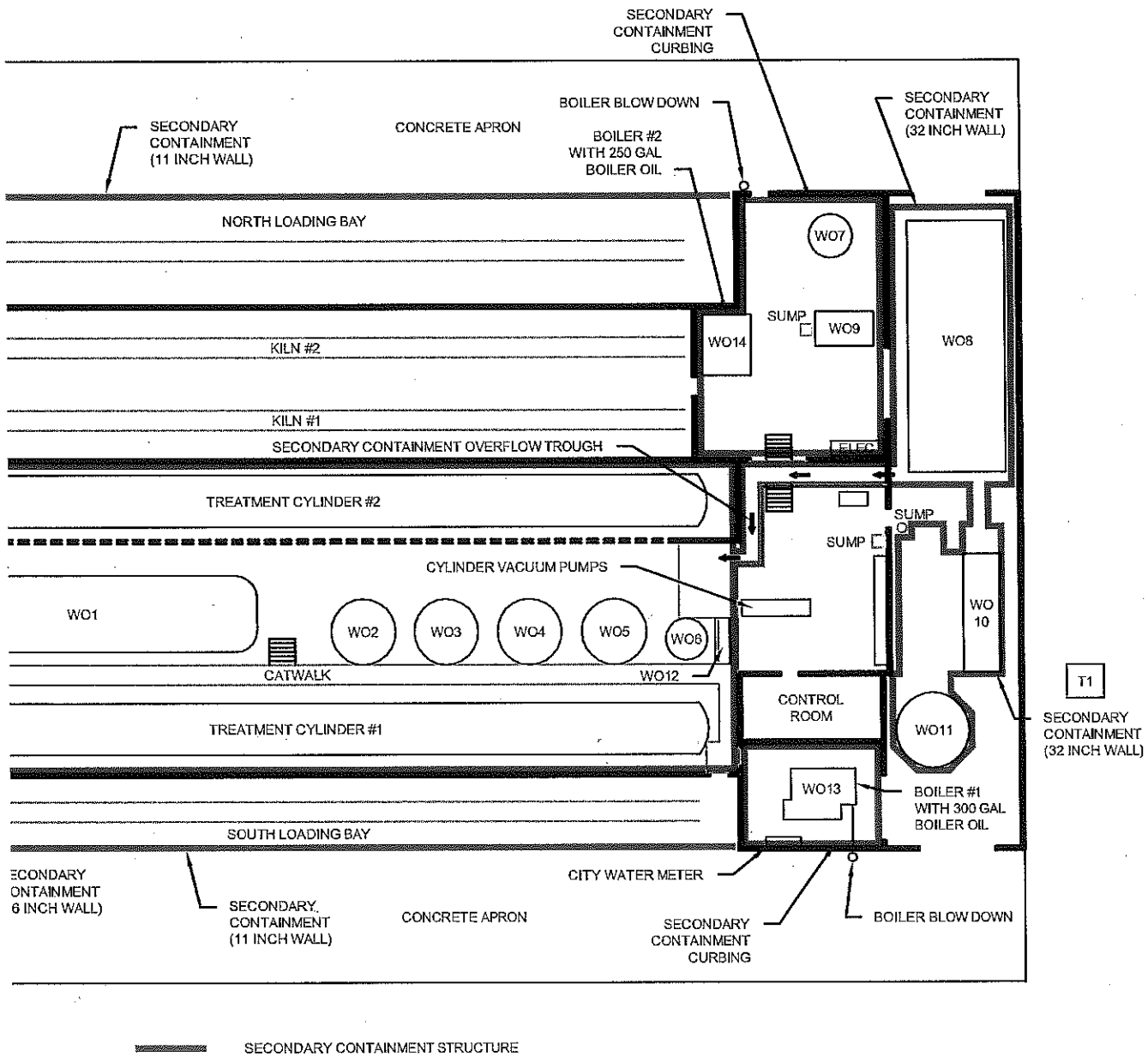


figure 6.3

FLOOR PLAN
WOOD TREATMENT BUILDING
Bell Lumber & Pole Company

CONTENTS	CAPACITY
GASOLINE	275 GALS.
HYDRAULIC OIL	110 GALS.

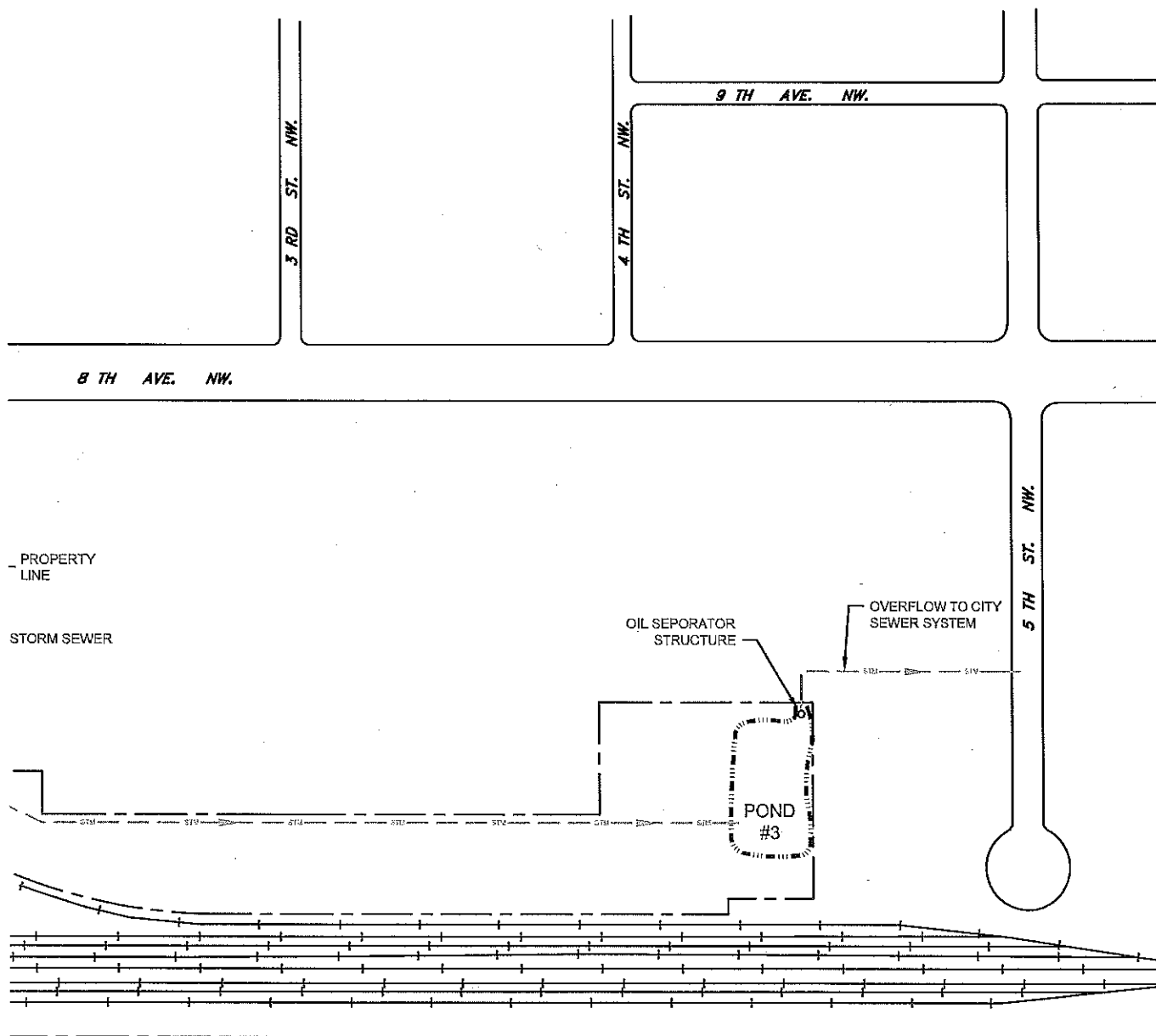
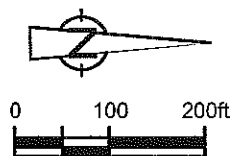
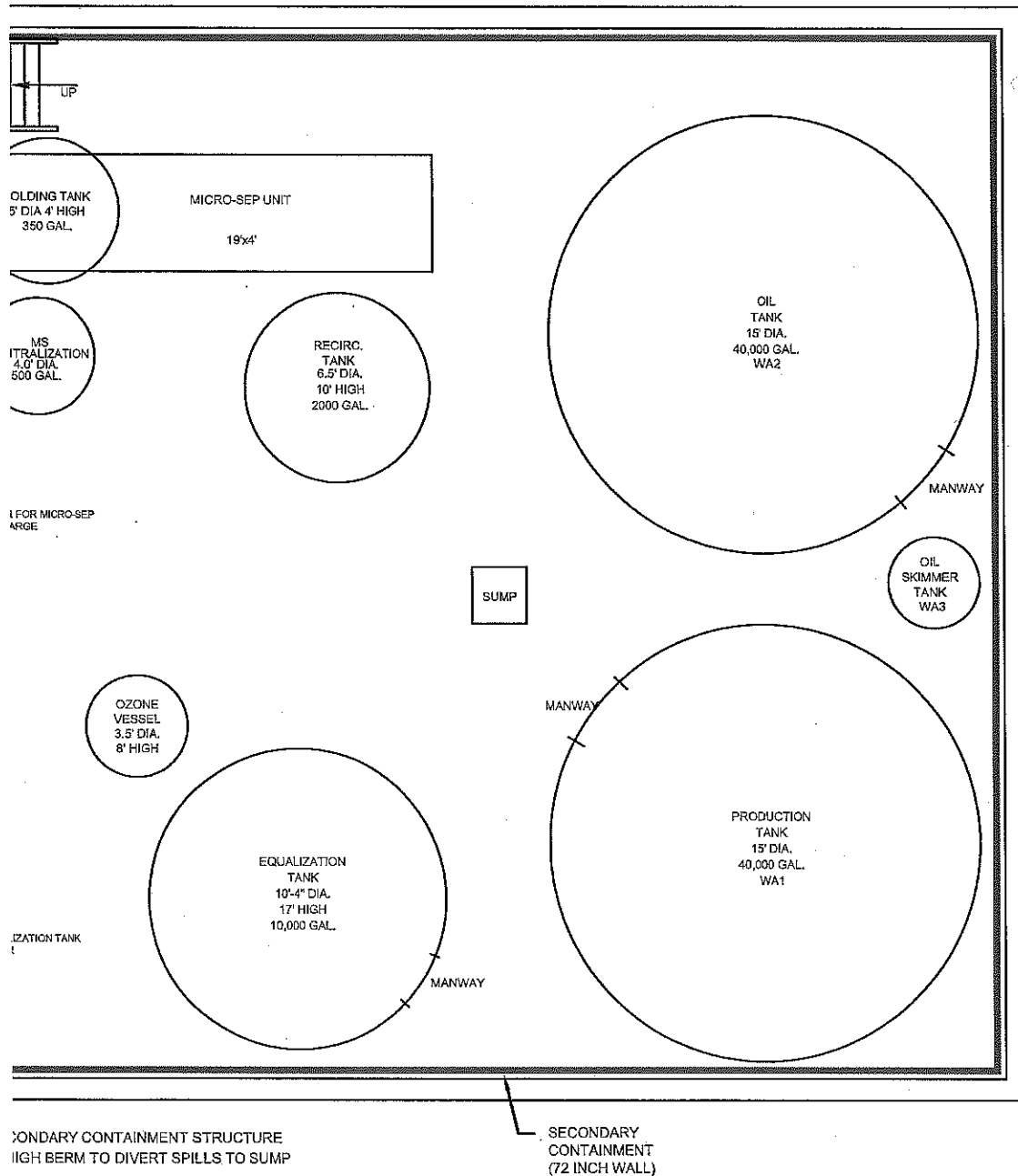


figure 6.2

FORMER MACGILLIS & GIBBS SITE

SPCC PLAN
SITE LAYOUT
Bell Lumber & Pole Company

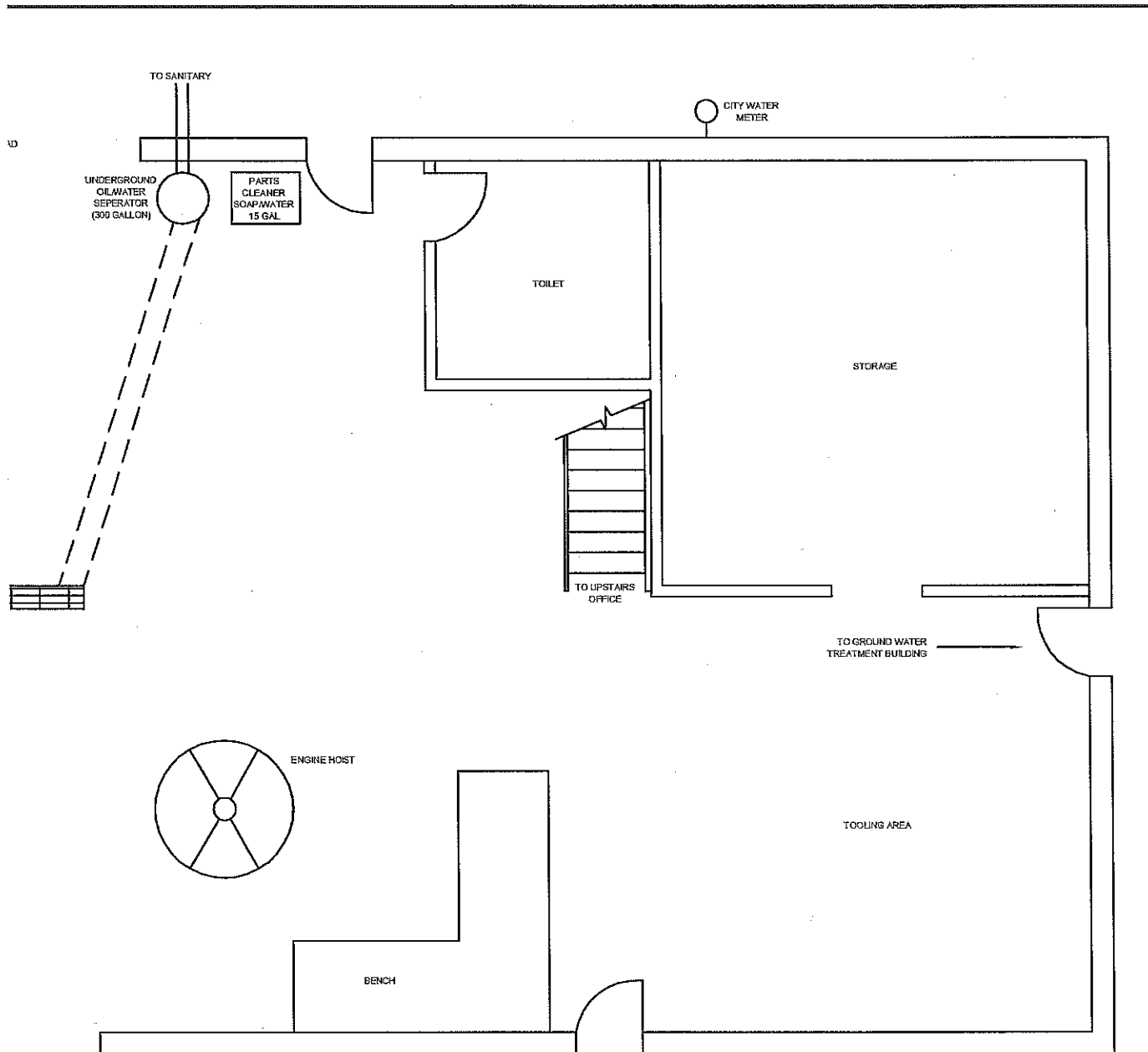


	CONTENTS	CAPACITY
	OIL / WATER	36,000 GALS. **
	RECOVERED OIL	36,000 GALS. **
ANK	OIL	90 GALS.
APT	OIL / WATER	3,770 GALS.

40,000 GALLONS; HOWEVER, FILL IS LIMITED TO
ED ALARMS AND HIGH LEVEL SHUT OFF CONTROLS.

figure 6.4

FLOOR PLAN
WATER TREATMENT BUILDING
Bell Lumber & Pole Company



CONTENTS

CAPACITY

GASOLINE	275 GALS.
DIESEL	970 GALS.
TRANSMISSION FLUID	110 GALS.
USED OIL	250 GALS.
MOTOR OIL	200 GALS.
MOTOR OIL	200 GALS.
KEROSENE	110 GALS.
HYDRAULIC OIL	110 GALS.

figure 6.5

FLOOR PLAN
MAINTENANCE SHOP
Bell Lumber & Pole Company

LEGEND
→ DIRECTION OF FLOW

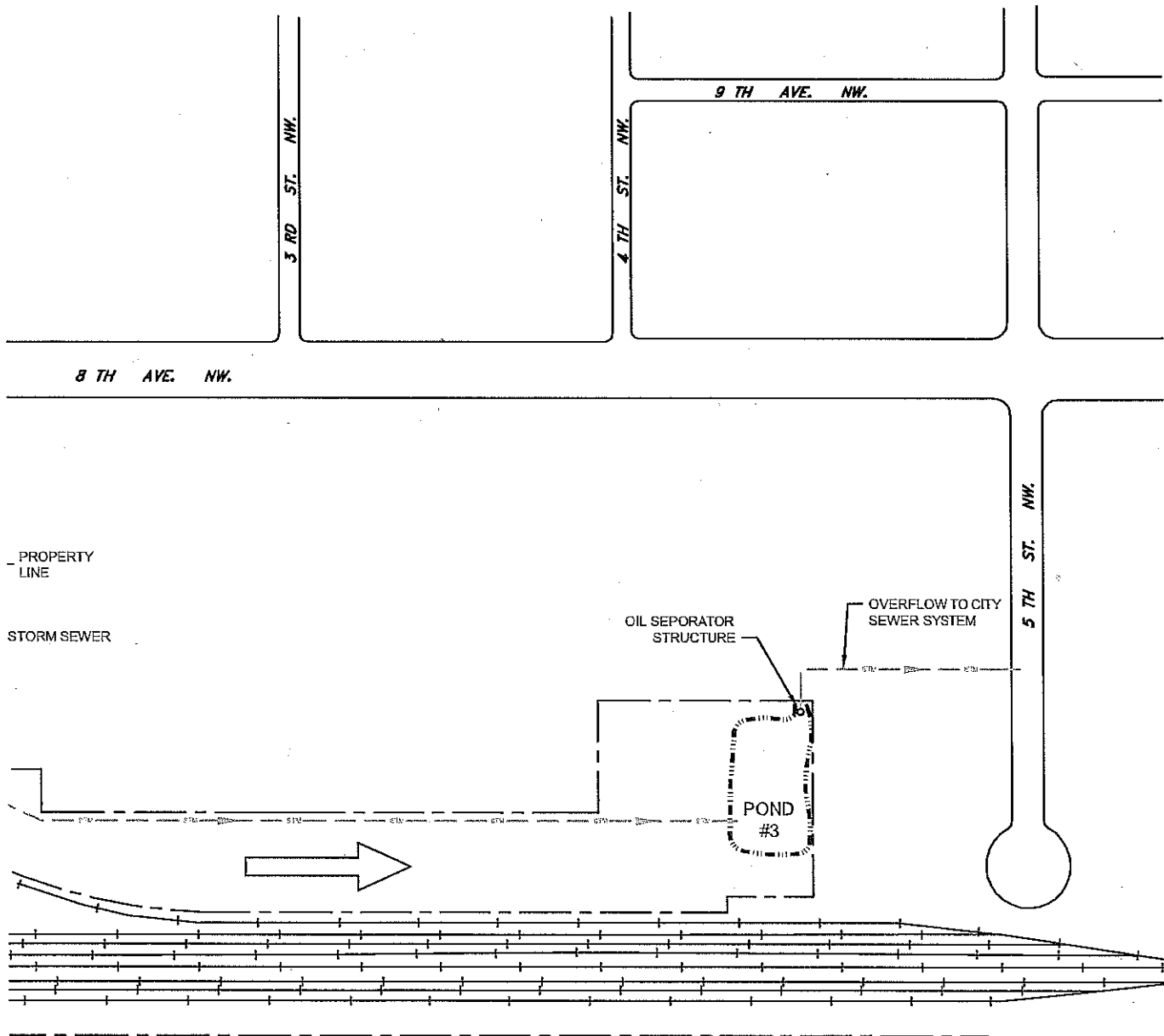
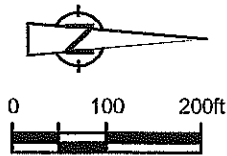


figure 6.6

FORMER MACGILLIS & GIBBS SITE

SPCC PLAN
SITE DRAINAGE PATTERNS
Bell Lumber & Pole Company

**OIL STORAGE INVENTORY
BELL LUMBER & POLE COMPANY
NEW BRIGHTON, MINNESOTA**

<i>ID No.</i>	<i>Tank Name</i>	<i>Tank Contents</i>	<i>Tank Capacity (Gallons)</i>	<i>Secondary Containment*</i>
<u>Wood Treatment Building</u>				
WO1	Work Tank #1	Pentacholophenol/fuel oil Mixture	46,000	Secondary containment is provided within the building by a series of interconnected concrete containment areas that serve all the tanks in the building. Ultimately, all contents of tank containers would drain into the treatment center room (130ft x 46ft x 3.8ft) and the tram transfer bay (150ft x 100ft x 2.7ft) which have a cumulative volume of over 500,000 gallons.
WO2	Overflow Tank	Pentacholophenol/fuel oil/water	10,000	
WO3	WPO Tank #3	Fuel Oil	10,000	
WO4	WPO Tank #4	Fuel Oil	10,000	
WO5	Penta Storage	Pentacholophenol/fuel oil Mixture	10,000	
WO6	Combination Tank	Pentacholophenol/fuel oil Mixture	2,000	
WO7	Decant Tank	Water, Penta and Light Oils	5,200	
WO8	Work Tank #2	Pentacholophenol/fuel oil Mixture	48,000	
WO9	Chiller Unit	Gylcol	1,000	
WO10	Block Dissolver	Solid Pentacholophenol with fuel oil	4,275	
WO11	Mix Storage	Biodiesel	10,000	
WO12	Vacuum pump tank	Fuel Oil	800	
WO13	Boiler #1	Boiler Oil	300	
WO14	Boiler #2	Boiler Oil	250	
WO15	Drum	Copper Napthanate	55	
T1**	Transformer (pad-mounted)	Transformer oil	250	Secondary containment is provided by the onsite retention ponds.

Water Treatment Building

WA1	Process Tank ^a	Oil-Impacted Water	36,000	Secondary containment is provided within the building by a concrete a floor and 6 foot walls. The containment area measures 35ft x 35ft for a total gross volume of 7350ft ³ . Other tanks and equipment occupy 1995ft ³ leaving a net containment volume of 5355ft ³ or 40052 gallons.
WA2	Oil Tank ^a	Recovered Oil from Ground	36,000	
WA3	Green Oil Skimmer Tank	Oil	90	
***	Oil Skimmer Tank	Oil	50	
WA4	Filter Press Drum	Oil	55	Secondary containment is provided within the building by a concrete floor, draining into the sump area which automatically pumps liquids back to the process tank. In the unlikely event that the mixture, which is predominantly water, left the building, it would be contained by the onsite retention ponds.
WA5	Air Flootation Tank (DAF) Although the tank is 3770 gallons, the oil containing area of the tank has a capacity of 100 gallons	Oil-Impacted Water	100	

**OIL STORAGE INVENTORY
BELL LUMBER & POLE COMPANY
NEW BRIGHTON, MINNESOTA**

<i>ID No.</i>	<i>Tank Name</i>	<i>Tank Contents</i>	<i>Tank Capacity (Gallons)</i>	<i>Secondary Containment*</i>
---------------	------------------	----------------------	------------------------------------	-------------------------------

Maintenance Shop

MS1	Gas Tank	Gasoline (outside)	275	Tank is double-walled with leak detection system. Secondary containment is provided by the centrally sloped concrete floor of the 98ft x 37ft building which is equipped with a floor drain system leading to a 300 gallon oil/ water separator and drains to the onsite retention ponds.
MS2	Diesel Tank	Diesel Fuel	970	
MS3	Transmission Fluid Tank	Transmission Fluid	110	
MS4	Used Oil Tank	Used Oil	250	
MS5	Motor Oil Tank	Motor Oil	200	
MS6	Motor Oil Tank	Motor Oil	200	
***	Grease Drum	Heavy Grease	12	
MS7	Kerosene Drum (2)	Kerosene	110	
MS8	Hydraulic Oil Drum (2)	Hydraulic Oil	110	

Shaver Building

SB1	Hydraulic Oil Tank	Hydraulic Oil	110	Secondary containment is provided by the concrete floor of the 45ft x 20ft building (approximate secondary containment capacity of 3300 gallons)
-----	--------------------	---------------	-----	--------------------------------------------------------------------------------------------------------------------------------------------------

Total volume **232,295**
(including containers >54 gallons)

Notes:

*Each area containing oil has drainage to three on-site retention ponds which have a total storage capacity of 71,000 gallons.

**Oil filled electrical equipment are not included in the total facility volume.

***Containers which have not been assigned an ID No. are exempt due to capacity less than 55 gallons.

^a WA1 and WA2 are equipped with automated alarms and pump shut-off controls that limit the storage capacity to 36,000 gallons each (the actual tank capacities are 40,000 gallons)

TABLE 6.2

**SPILL CONTROL EQUIPMENT AND LOCATION
BELL LUMBER AND POLE COMPANY
NEW BRIGHTON, MINNESOTA**

<i>Type of Spill Control Equipment</i>	<i>Location of Spill Control Equipment</i>
Shavings	Shavings Building (storage hopper)
1000 gallon mobile tank with electric motor	Parking lot near former Water Treatment Building
Special sorbent pads	Wood Treatment Building (former penta block storage area)
	Water Treatment Building (laboratory/storage area)
Pumps and hose	Wood Treatment Building (storage bay)
Mask, respirator, protective clothing, gloves, boots)	Wood Treatment Building (control room)
	Water Treatment Building (laboratory/storage area)
Extinguisher	Wood Treatment Building (storage bay)
	Water Treatment Building (laboratory/storage area)
Compressed air hoses	Wood Treatment Building (storage bay)
Forks, pitch fork	Wood Treatment Building (storage bay)
	Wood Treatment Building (storage bay)
	Water Treatment Building (laboratory/storage area)

TABLE 6.3

**SPILL AND EMERGENCY RESPONSE
ROLES AND RESPONSIBILITIES
BELL LUMBER & POLE COMPANY
NEW BRIGHTON, MINNESOTA**

<i>General Description</i>	<i>Specific Duties</i>
Determines response and planning objectives, allocates resources, determines chain of command and evaluates response performance.	<ul style="list-style-type: none"> - provides the necessary facilities, equipment and financial support - provides adequate personnel and time resources - prepares all statements for release to news media and public
Reports to senior management. Has authority to direct response operations. Assumes total control over site activities.	<ul style="list-style-type: none"> - prepares and organizes the background review of the situation, the work plan and the field teams - determines if situation is Major Emergency - a Major Emergency is defined as one that has affected or has the potential to affect persons or property outside of Bell Pole site - briefs field teams on specific assignments - prepares final report and support files on response activities - serves as liaison with public officials (Police, Fire Department) - ensure site security - determines need for external resources
Team is involved in field activities as directed by Emergency Response Coordinator.	<ul style="list-style-type: none"> - safely complete on-site tasks - complies with site safety plan
Used to remove injured personnel from emergency area.	<ul style="list-style-type: none"> - provide first aid - assist ambulance attendants, if required
Responsible for communications and emergency assistance. Also acts as record keeper.	<ul style="list-style-type: none"> - makes all necessary outside phone calls - maintains a log of communication and site activities - maintains communication contact with work parties as required
Provide assistance as required.	<ul style="list-style-type: none"> - police - fire department - contractors
Responsible for coordinating all activities in the staging area.	<ul style="list-style-type: none"> - completes a head count of all personnel in the staging area and determines if anyone is missing - reports results of head count to ERC - assembles field teams as directed by ERC - assigns site security - directs emergency response vehicles upon arrival at the site

APPENDIX A

SUBSTANTIAL HARM CHECKLIST

APPENDIX A

CERTIFICATION OF THE APPLICABILITY OF SUBSTANTIAL HARM CRITERIA [40 CFR 112 Attachment C-II]

FACILITY NAME: Bell Lumber and Pole Company

FACILITY ADDRESS: 778 First Street Northwest, New Brighton, Minnesota 55112

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
YES ☐ NO ☒
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?
YES ☐ NO ☒
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E of this part, Section 10 for availability) and the applicable Area Contingency Plan.
YES ☐ NO ☒
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²?
YES ☐ NO ☒
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced irreparable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?
YES ☐ NO ☒

CERTIFICATION: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature

Rick Bleskey

Name (please type or print)

Facility Manager

Title

Date

¹ If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

² For the purposes of 40 CFR Part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c)

APPENDIX B

FIVE YEAR REVIEW DOCUMENTATION

APPENDIX C

OIL TRANSFER PROCEDURES

APPENDIX C

OIL TRANSFER PROCEDURES

Tank and Mobile Equipment Filling

Operators tasked and trained to use or fill the diesel and gasoline tanks will follow the following procedures when the tank is being filled:

1. Spot tanker truck or mobile equipment, chock wheels, and follow other applicable DOT regulations.
2. Place drip pans or absorbent material at all hose connections before fuel transfer begins.
3. Inspect transfer hose for signs of damage/holes.
4. Ensure that all hose connections are secured from the tanker truck or mobile equipment to the fuel tank.
5. The Operator shall monitor the level gauge to prevent overfilling of the fuel tank.
6. Begin fuel transfer. When the desired level is reached, stop the fuel transfer.
7. The operator will disconnect the transfer hose from the tanker truck and the fuel tank and cap both ends of the hose to eliminate any spillage from the transfer hose.

During the fuel transfer, constant attendance must be maintained by either a Bell Lumber and Pole Company employee or a fueling operator who has knowledge of the spill kits and their location (inside the Wood Treatment and Water Treatment Buildings). If the operator observes a spill of oil from any of the equipment the operator shall immediately terminate the transfer and initiate the oil spill response procedure.

APPENDIX D
EMERGENCY CONTACT LIST

EMERGENCY CONTACTS

Thomas Bell General Manager	Bell Pole	(651) 426-3808
Rick Bleskey Midwest Operations Coordinator	Bell Pole	(651) 203-2705
Craig Hiljus Foreman	Bell Pole	(612) 801-0151
Steve Kracht Sale Manager	Bell Pole	(651) 783-7267
Darrell Knowles Groundwater Treatment Building	Bell Pole	(952) 472-8076
Gary Zollner Yard Laborer	Bell Pole	(651) 231-2535
Gary Chambers Wood Treatment Building	Bell Pole	(651) 429-6776
Dispatcher	Metro Spill Response	(651) 649-5451
Fire Emergency		911
New Brighton Fire Department	Non-emergency	(651) 638-2160
Police		911
National Response Center		(800) 424-8802
<hr/>		
Local Doctor Clinic (Columbia Park Medical Center) 4000 Central Avenue, Columbia Heights		(763) 572-5710
Local Hospital (Unity Medical Center) 550 Osborne Road, Fridley		(763) 780-6844
<hr/>		
Xcel Energy - Electric	Emergency	(800) 895-1999
Xcel Energy - Gas	Emergency	(800) 895-2999

OUTSIDE CONTRACTORS

Muska Electric	Terry Artman	(651) 636-5820
Naseff Plumbing	Mickey Naseff	(651) 777-0001
Belair Builders Hazmat, General	Mark Muriowski	(651) 786-1300
Determan Brownie, Inc. Hazmat, General	Bob Chency	Work: (763) 502-9648 Home: Non- Cell: Non-
Supreme Lines	Arien	Day Time: Non- Night Time: Non-

APPENDIX E

FACILITY INSPECTION FORMS

**ROUTINE INSPECTION REQUIREMENTS
BELL LUMBER & POLE COMPANY**

<i>Item</i>	<i>Inspection Area</i>	<i>Frequency</i>	<i>Form</i>	<i>Number</i>
(SWPP)/ Sanitation System	Tank Farm, Pipes, Valves, Treated Wood Storage	Daily	Yes	1
	Ditches, Swales, Retention Pond	Weekly and after Significant Storm Events	Yes	1
CRA	Hazardous Waste Storage Area	Weekly	Yes	3
	Drip Pad	Weekly	Yes	4
	Treated Wood Storage	Daily	Yes	1
	Tank Farm, Pipes, Valves	Daily	Yes	1
	Storage Time on Drip Pad	Daily	Yes	5
75-90-OT-1	Packed Tower, Pump, Valves, and Piping	Daily	Daily Log Book	
	Packing Inside Tower	Biannual	Daily Log Book	
or Measure Plan	Tank Farm, Pipes, Valves, Cylinder	Weekly	Yes	1

**WATER TREATMENT BUILDING
WEEKLY INSPECTION LOG**

**BELL LUMBER & POLE COMPANY
SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN**

Inspection Date: _____

Bell Pole Inspector: _____

<u>ITEM</u>	<u>CHECK IF OK</u>	<u>REPAIRS/COMMENTS</u>
<i>Tankage (Leaks, Level Sensors)</i>		
Process Tank	_____	_____
Oil Storage Tank	_____	_____
Equalization Tank	_____	_____
Oil Skimmer Tank	_____	_____
AF Skimmer Tank	_____	_____
AF Surge Tank	_____	_____
Neutralization Tank	_____	_____
Sump 1	_____	_____
Sump 2	_____	_____
Air Flootation Unit	_____	_____
Ozone Unit	_____	_____
<i>Pumps (leaks, Auto Shut Off)</i>		
Pump 1	_____	_____
Pump 2	_____	_____
Pump 17	_____	_____
Pump 18	_____	_____
Pump 20	_____	_____
Pump 25	_____	_____
Pump 32	_____	_____
Pipes, Valve, Fittings	_____	_____
Floor (Cracks, Sealant Gaps)	_____	_____
PW4 Transfer Tank	_____	_____
Microsept Pumps,	_____	_____
Values and Fittings	_____	_____

FORM 1**DAILY
INSPECTION OF TANK FARM, PIPES, VALVES, TREATING CYLINDER AND
TREATED WOOD STORAGE AREA
FOR LEAKS AND DRIPPAGE**

THIS FORM IS USED FOR SPCC, NPDES, & SWPP REQUIREMENTS

Inspection Date: _____

Bell Pole Inspector: _____

<u>ITEM</u>	<u>CHECK IF OK</u>	<u>ITEM</u>	<u>CHECK IF OK</u>
Cylinder #1 Door	_____	Cylinder Door Fail Safe Light (#1 & #2)	_____
Cylinder #2 Door	_____	Sight Glasses	_____
Heat Exchanger #1	_____	Work Tank #1	_____
Heat Exchanger #2	_____	Work Tank #2	_____
Combo Tank	_____	Fuel Oil Tank #1	_____
Decant Tank	_____	Mixer Tank	_____
#2 Fuel Tank #2	_____	Filter Press	_____
Temperature Controls	_____		

PUMPS

#1 Transfer	_____	Scrubber	_____
Decant Tank	_____	#2 Transfer	_____
Large Circulation	_____	Condensate	_____
#1 Vacuum Pump	_____	Small Circulation	_____
#2 Vacuum Pump	_____		

VALVES

#101_____	#102_____	#103_____	#104_____	#107_____	#108_____	#109_____	#110_____
#111_____	#112_____	#114_____	#115_____	#116_____	#118_____	#119_____	#201_____
#202_____	#203_____	#204_____	#205_____	#206_____	#207_____	#208_____	#209_____
#211_____	#214_____	#216_____	#218_____	#219_____	Filter Inlet_____	Filter Outlet_____	
Drain Valve_____	Truck Unload_____						

BLOCK DISOLVER AREA

Block Disolver Tank	_____	Valves	_____
Fuel Oil Tank	_____	Piping	_____
Pump #1	_____	Pump #2	_____

CYLINDER DOOR SUMP

Date Cleaned: _____ Amount of Material Removed to Hazardous Waste Storage _____ gallons

Note any repairs, action taken on leaks, or any other additional comments here. Use backside if more space is necessary.

Outside Treated Wood Storage Areas: Check daily for Drillage. Remove any Stained Soil to Hazardous Waste Drum Storage.

Drillage noted? Yes No If yes, record amount of soil recovered _____ gallons. Comments:
Warning Label for Treated Wood Storage in Place? Yes No**SUBMIT THIS INSPECTION FORM EACH DAY TO YARD FORMAN**

FORM 2

**WEEKLY
INSPECTION OF YARD DRAINAGE DITCHES,
RETENTION POND, AND SWALES
FOR DEBRIS AND CONTAMINATION**

THIS FORM IS USED FOR NPDES REQUIREMENTS

Inspection Date: _____

Bell Pole Inspector: _____

Check Drainage Ditches, Swales (low spots in yard), and Retention Pond for Presence of Floating Debris, Excessive Sedimentation, and Visible Signs of Contamination.

The above must also be checked after a **SIGNIFICANT RAINFALL EVENT**. A Significant Event is one that causes an overland flow or surface flow of water.

This is a Weekly Inspection: Yes No This is a Significant Rainfall Event Inspection: Yes No

This is an Annual Storm Event Inspection Yes No

Record Results of Inspection and Actions Taken. Use backside of form if necessary.

WEST SIDE DITCH

EAST SIDE RETENTION POND SYSTEM

NORTH END RETENTION POND

SUBMIT THIS INSPECTION FORM EACH WEEK TO YARD FORMAN

FORM 3

**WEEKLY INSPECTION
OF
HAZARDOUS WASTE STORAGE AREAS
AND
HAZARDOUS WASTE STORAGE CONTAINERS**

THIS FORM IS USED FOR RCRA (Resource Conservation and Recovery Act) REQUIREMENTS

Inspection Date: _____

Bell Pole Inspector: _____

STORAGE OF HAZARDOUS WASTE IN WOOD TREATMENT BUILDING

1. Keep hazardous waste containers closed, except to add or remove waste. Drum lids must be secured and the ring bolted tight.
2. Maintain adequate aisle space to ensure unobstructed movement of personnel, and fire and spill equipment. Labels must be clearly visible.
3. Restrict access to the storage site to prevent accidental damage from equipment.

SATELLITE ACCUMULATION-CROW/MAINTENANCE BUILDING

1. Waste must be stored at or near the point of generation.
2. Waste accumulation is limited to 55 gallons.
3. Date is marked on the container when filled.
4. Waste is moved to permanent storage within 3 days of fill date.
5. Waste is under direct control of process supervisor.

MARKING AND LABELING CONTAINERS

1. Mark the containers with the words **HAZARDOUS WASTE**.
2. Mark the container with a clear description of the waste.
3. Mark the container with the accumulation start date. The accumulation start date for very small quantity generators (VSQG) is the date that the 1000 kg (about 4 drums) limit is reached.
4. A VSQG generates less than 100 kg of waste per month (about 220 pounds or 22 gallons).

SHIPPING HAZARDOUS WASTE

1. All hazardous waste shipments require a DOT Hazard Label (4X4). Check with either DOT or the hazardous waste shipper on proper type and number of labels required.
2. All hazardous waste shipments require a DOT ID number.
3. All hazardous waste shipments require a company name and address, EPA ID number, manifest document number, accumulation start date, and the words: "**HAZARDOUS WASTE-FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.**"

**USE LOG BOOK LOCATED IN PLANT MANAGERS OFFICE TO RECORD
WEEKLY INSPECTIONS. INSPECTIONS SHOULD CONFORM TO ABOVE.**

FORM 3

**WEEKLY INSPECTION
OF
HAZARDOUS WASTE STORAGE AREAS
AND**

HAZARDOUS WASTE STORAGE CONTAINERS

THIS FORM IS USED FOR RCRA (Resource Conservation and Recovery Act) REQUIREMENTS

SHIPPING HAZARDOUS WASTE

1. All hazardous waste shipments require a DOT Hazard Label (4X4). Check with either DOT or the hazardous waste shipper on proper type and number of labels required.
2. All hazardous waste shipments require a DOT ID number.
3. All hazardous waste shipments require a company name and address, EPA ID number, manifest document number, accumulation start date, and the words:
"HAZARDOUS WASTE-FEDERAL LAW PROHIBITS IMPROPER DISPOSAL."

**USE LOG BOOK LOCATED IN PLANT MANAGERS OFFICE TO RECORD
WEEKLY INSPECTIONS. INSPECTIONS SHOULD CONFORM TO ABOVE.**

FORM 4

WEEKLY
INSPECTION OF DRIP PAD
HAZARDOUS WASTE STORAGE AREAS
AND

WASH DOWN COLLECTION TRENCH AND SUMP

THIS FORM IS USED FOR RCRA (Resource Conservation and Recovery Act) REQUIREMENTS

Inspection Date: _____

Bell Pole Inspector: _____

Federal and state regulations under RCRA (Resource Conservation and Recovery Act) require weekly inspection of the drip pad, and cleaning as required. The rule states: "Cleaning of drip pads is required in a manner and frequency to be determined on a facility-specified basis by the owner/operator to allow weekly inspection of the entire surface of the drip pad." In addition, "Owners and operators must document, in the facility's operating record, the date, time, and quantity of leakage collection when it is removed from the collection device." The collection device here is the underlying concrete floor.

The drip pad consists of a solid steel transfer table. Although it is not anticipated that the steel transfer table will ever leak, inspections nevertheless, need to be made of both the transfer deck and the underlying concrete.

The wash down collection trench and sump system, also, require weekly inspection for leaks and proper operation.

As part of this inspection report, the north and south loading bays, and the interior storage bays will be inspected for cleanliness, integrity, and drippage.

	<u>CHECK IF OK</u>	<u>NOTE COMMENTS, REPAIRS, OR CLEANING</u>
<u>TRANSFER DECK</u>	_____	_____
<u>CONCRETE FLOOR</u>	_____	_____
<u>COLLECTION TRENCH</u>	_____	_____
<u>SUMP PUMP</u>	_____	_____
<u>SOUTH BAY</u>	_____	_____
<u>NORTH BAY</u>	_____	_____
<u>STORAGE BAY #1</u>	_____	_____
<u>STORAGE BAY #2</u>	_____	_____
<u>STORAGE BAY #3</u>	_____	_____

SUBMIT THIS INSPECTION FORM EACH WEEK TO YARD FORMAN

APPENDIX F

AGREEMENT TO RESPOND TO LARGE SPILL



Bell Lumber & Pole Company

P. O. Box 120786
New Brighton, Minnesota 55112-0024

Phone 651-633-4334 • Fax 651-633-8852 • e-mail: poleinfo@bellpole.com

Producers and Processors of Pressure Treated Wood

March 14, 2003

US Mailed
3.17.03

Mr. Mark Murlowski
BELAIR BUILDERS
2200 Old Highway 8 N.W.
St. Paul, Minnesota 55112

Re: Prearrangement for Spill Control Measures
Bell Lumber and Pole Company, New Brighton, Minnesota

In order to comply with State of Minnesota requirements for spill prevention measures, Bell Lumber and Pole Company needs proof of prearranged third party services and equipment to respond to a potential spill at the New Brighton, Minnesota facility. In the case of a spill, Bell Pole requests your company's assurance to supply manpower, tankage, and equipment to contain or clean up a spill of wood treating oil within 24 hours of notification. This oil contains a 7 percent mixture of pentachlorophenol (PCP) in No. 2 fuel oil. Material safety and data sheets for the oil and PCP are attached.

Please acknowledge agreement by signing in the space below that your company will be able to provide this service to Bell Pole.

Sincerely,

BELL LUMBER AND POLE COMPANY

Clarence Westberg
Plant Manager

Belair Builders agree to provide emergency spill response to Bell Lumber and Pole Company at its New Brighton, Minnesota facility as per the SPCC Plan developed for the Site.

Belair Builders Inc.

3.17.03

Date



Bell Lumber & Pole Company

P. O. Box 120786
New Brighton, Minnesota 55112-0024

Phone 651-633-4334 • Fax 651-633-8852 • e-mail: poleinfo@bellpole.com

Producers and Processors of Pressure Treated Wood

March 14, 2003

Mr. Rick Anderson
DETERMAN-BROWNING
1241 72nd Avenue N.E.
Fridley, Minnesota 55432

Re: Prearrangement for Spill Control Measures
Bell Lumber and Pole Company, New Brighton, Minnesota

In order to comply with State of Minnesota requirements for spill prevention measures, Bell Lumber and Pole Company needs proof of prearranged third party services and equipment to respond to a potential spill at the New Brighton, Minnesota facility. In the case of a spill, Bell Pole requests your company's assurance to supply manpower, tankage, and equipment to contain or clean up a spill of wood treating oil within 24 hours of notification. This oil contains a 7 percent mixture of pentachlorophenol (PCP) in No. 2 fuel oil. Material safety and data sheets for the oil and PCP are attached.

Please acknowledge agreement by signing in the space below that your company will be able to provide this service to Bell Pole.

Sincerely,

BELL LUMBER AND POLE COMPANY

Clarence Westberg
Plant Manager

Determan-Browning agrees to provide emergency spill response to Bell Lumber and Pole Company at its New Brighton, Minnesota facility as per the SPCC Plan developed for the Site.

Determan-Browning

4-24-03

Date

APPENDIX G

SPILL PREVENTION AND RESPONSE TRAINING

AGENDA
ANNUAL TRAINING
WORKERS-RIGHT-TO-KNOW¹
MAY 2009

- REQUIREMENTS OF THE TRAINING (i.e. hazard notification-chemical, physical, and noise)
- MSDS REVIEW - UPDATE BINDER
- REVIEW OF UPDATED SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN (includes inspection forms and emergency equipment) Updated for 2009.
- REVIEW OF HEALTH AND ENVIRONMENTAL POLICY STATEMENT
- REPORT SCHEDULE FOR 2009
- REVIEW OF PENTACHLOROPHENOL CONSUMER INFORMATION SHEET

I attended the above meeting and understand the material covered.²

Signed: _____

Date: _____

¹ This training is provided to employees that come into contact with, or work with, chemicals. Physical hazards are covered under monthly safety meetings.

² A copy of this training record is placed into the personnel file of each employee attending this season.